

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-CR-159

CHARLES EDWARDS

Defendant.

**DEFENDANT’S MOTION FOR EXTENSION TO FILE OBJECTIONS
TO THE PRESENTENCE REPORT**

The Defendant, Charles Edwards, by his attorney, hereby moves the Court for an order extending the deadline for filing objections to the Presentence Report (the “Report”) until June 22, 2018. As grounds for this motion, the Court is shown the following:

Undersigned counsel received the Report, issued by the U.S. Probation Office, on May 4, 2018. At that time, Edwards’s sentencing hearing was scheduled for June 14, 2018. Objections to the PSR are due May 25, 2018. Sentencing has since been re-scheduled to September 5, 2018.

Counsel requests additional time to review the Report with Edwards to ensure that he fully understands everything in the Report. Edwards has had some health issues in the last several days that have made visiting him difficult. Therefore, counsel requests additional time to review the Report with Edwards and submit any objections. Counsel attempted to contact the PSR writer, Lisa Cyrak, however, her email reply indicates she is out of the office until May 29, 2018.

WHEREFORE the Defendant respectfully requests that the deadline to file objections to the Presentence Report be extended to June 22, 2018.

Dated this 24th day of May, 2018

FOX, O'NEILL & SHANNON, S.C.
Attorneys for Defendant

/s/ Jacob A. Manian

By: _____
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